

MEMO ENDORSED

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File 5062.2

November 8, 2021

By ECF

Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007
CaproniNYSDCChambers@nysd.uscourts.gov

**Re: *United States of America v. Charles Watson, Jr.*
Case No. 21-cr-603 (VEC)**

Dear Judge Caproni:

On behalf of my client, Charles Watson, Jr., I write to request a modification to the terms and conditions of his pretrial release. At the time of his presentment and arraignment in S.D.N.Y., we agreed to the government's request that Mr. Watson's travel be restricted to S.D.N.Y. and E.D.N.Y., the District of Nevada (where he resides), and the Central District of California (where my office is located). Magistrate Judge Moses accordingly imposed this bond condition.

On November 2, 2021, I contacted Mr. Watson's supervising Pretrial Officers in S.D.N.Y. and D. Nev. to obtain the position of Pretrial Services on Mr. Watson's request to travel domestically to other districts on certain dates to accompany his 14 year-old daughter to volleyball tournaments. Mr. Watson traditionally accompanies his daughter on these trips to support her in an extracurricular activity that is very important to her.

Both Pretrial Officers indicated that they had no objection to the requested travel. The Pretrial Officer in Nevada, who supervises Mr. Watson on a day-to-day basis, suggested that the travel restrictions imposed were unnecessary, and asked that when we contact the Court to obtain permission for Mr. Watson to travel on the requested dates, we also seek modification of Mr. Watson's bond conditions to allow him to travel domestically with advance approval by Pretrial Services. The Pretrial Officer in S.D.N.Y. agreed with this suggestion.

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On November 2, 2021, I contacted the Assistant United States Attorneys assigned to this matter and forwarded them the email exchange with the Pretrial Officers. On November 5, 2021, AUSA Ryan Finkel responded that the government does not oppose the request to modify Mr. Watson's bond conditions to allow him to travel domestically, provided he gives his Pretrial Services Officer at least 48 hours' notice and receives approval from that Officer.

Accordingly, we respectfully request that Mr. Watson's bond conditions be modified to allow him to travel domestically, provided he gives his Pretrial Services Officer at least 48 hours' notice and receives approval from that Officer.

Sincerely,



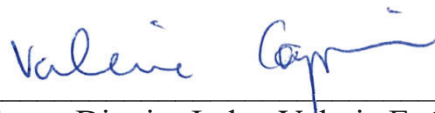
Ariel A. Neuman

The Bond Conditions for defendant Charles Watson, Jr., shall be modified to allow him to travel domestically, provided he gives his supervising Pretrial Services Officer at least 48 hours' notice and receives approval from that Officer.

It is so ORDERED.

November 8, 2021

Date



United States District Judge Valerie E. Caproni